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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALAN KARTMAN, an individual;

Plaintiff,

vs.

OCWEN LOAN SERVICING, LLC.; MTC
FINANCIAL, INC., dba TRUSTEE CORPS; DOE
Defendants I through X, inclusive; and ROE
CORPORATIONS A through Z, inclusive,

Defendants.

Case No.: 2:09-cv-02404-RCJ-PAL

PROPOSED DISCOVERY PLAN

**SPECIAL SCHEDULING
REVIEW REQUESTED**

COMES NOW, Plaintiff ALAN KARTMAN, by and through his attorneys of the Law
Offices of Jacob Hafter & Associates, and Defendants Ocwen Loan Servicing, LLC and MTC
Financial, Inc., by and through its attorney MALCOLM CISNEROS and hereby submit the
proposed discovery schedule for special scheduling review.

PROPOSED DISCOVERY SCHEDULE

1. Estimated Time Required for Discovery: Discovery will take 180 days (or the next
business day thereafter) from September 13, 2010, the date of the Rule 26(f) Conference. The
discovery deadline shall be **Friday, March 11, 2011**.

2. Amendment of Pleadings and Addition of Parties: Unless otherwise ordered by the
Court, the date for filing motions to amend the pleadings or to add parties shall not be later

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1 than ninety (90) days prior to the discovery cutoff date, which in this matter is no later than
 2 **Wednesday, December 13, 2010.**

3 3. Expert Witnesses and Rebuttal Witnesses: The disclosure of experts and expert
 4 reports shall occur on or before **Tuesday, January 11, 2011**, which is not less than sixty (60)
 5 days before the discovery cut off; and the disclosure of rebuttal experts and their reports shall
 6 occur on or before **Thursday, February 10, 2011**, which is thirty (30) days before the
 7 discovery cutoff date.

8 4. Interim Status Report: On or before **Tuesday, January 11, 2011**, the parties shall
 9 file an Interim Status Report as required by LR 26 3, stating the time required for trial, three
 10 alternative dates of trial, and whether or not trial will be proceeding or affected by substantive
 11 motions.

12 5. Dispositive Motions: The parties shall have until **Monday, April 11, 2011** to file
 13 dispositive motions. This is thirty (30) days after the discovery cutoff date and does not exceed
 14 the outside limit of thirty (30) days following the discovery cutoff date that LR 26 1(e)(4)
 15 presumptively sets for filing dispositive motions.

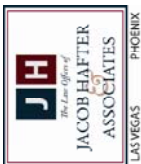
16 6. Pre Trial Order: The Pre Trial Order shall be filed by **Wednesday, May 11, 2011**,
 17 which is not more than thirty (30) days after the date set for filing dispositive motions in the
 18 case. This deadline is suspended if dispositive motions are timely filed and, in such case, the
 19 deadline for filing the Pre Trial Order shall be thirty (30) days after decision on said dispositive
 20 motions, or by further order of the Court. The disclosures required by FRCP Rules 26(a)(3)
 21 shall be made in the Joint Pre Trial Order.

22 7. Stipulations Regarding Limitations or Conditions or Additional Discovery: None.

23 8. Extensions of Modifications of the Discovery Plan and Scheduling Order:
 24 Applications to extend any date set by the Discovery Plan and Scheduling Order shall be
 25 received by the Court on or within twenty (20) days of the discovery deadline or within twenty
 26 (20) days before the expiration of any extension thereof that may have been approved by the
 27 Court.

28 The motion or stipulation shall include:

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- a. A statement specifying the discovery completed to date;
- b. A specific description of the discovery which remains to be completed;
- c. The reasons why remaining discovery was not completed within the time limits of the existing discovery deadline; and
- d. A proposed schedule for the completion of remaining discovery.
- e. Settlement: The undersigned attorneys affirm that they have discussed possible settlement of this action.

Dated this 15th day of September, 2010.

LAW OFFICE OF JACOB HAFTER, P.C.

By: /s/ Jacob L. Hafter

JACOB L. HAFTER, ESQ.

Nevada State Bar No. 9303

MICHAEL NAETHE, ESQ.

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Attorneys for Plaintiff

Dated this 15th day of September, 2010

MALCOLM CISNEROS

By: /s/ Kevin Hahn

KEVIN HAHN, ESQ.

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Las Vegas, Nevada 89101

Attorneys for Ocwen Loan Servicing,
LLC and MTC Financial, Inc.

ORDER

IT IS SO ORDERED

Dated this _____ day of _____, 2010

JUDGE

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